

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
Plaintiff,)	JUDGE WELLS
v.)	<u>JOINT MOTION TO</u>
SAP AMERICA, INC., et al.)	<u>SEAL TRANSCRIPTS</u>
Defendants.)	
)	

Defendants SAP America, Inc. and SAP AG (collectively “SAP”), Defendants The IBIS Group and LSI-Lowery Systems, Inc., (collectively “LSI Defendants”) and Plaintiff Hodell-Natco Industries, Inc. (“Hodell”), by and through their undersigned attorneys, hereby jointly request that the Court enter an order, in the form of the proposed order attached hereto, sealing all deposition transcripts that have been filed in their entirety in this matter. In support of this motion, counsel state as follows:

1. This civil action is a complex case involving a software implementation.
2. Each of the parties has filed a motion for summary judgment on one or more of the claims and/ or cross-claims in this action. These motions are currently pending before the Court.
3. In support of their respective positions on the pending motions the LSI Defendants and Hodell have filed more than a dozen transcripts, in their entirety, of depositions taken in this case.
4. The parties agree that although these transcripts should be available to this Court, the transcripts should not be publicly available.
5. Accordingly, the parties jointly request that this Court enter an order sealing all

deposition transcripts¹ that have been filed in their entirety, pursuant to the Protective Order (D.E. 56) entered in this case.

WHEREFORE, the parties jointly request that this Court enter an order, in the form attached hereto, directing the Clerk of Court to seal the deposition transcripts identified therein that have been individually filed in this matter.

Respectfully submitted,

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¹ The parties seek an order sealing the following Docket Entries, all of which are complete deposition transcripts: 106, 107, 108, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 123, 124, 125, 126, 127, 128, 129, 130, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, and 154.

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of October 2012, a copy of the foregoing Joint Motion to Seal was filed electronically. Parties may access this filing through the Court's electronic filing system.

/s/ Macavan A. Baird
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